



UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY REGION IX
75 Hawthorne
Street
San Francisco, CA
94105

May 8, 2017

Mr. Anthony R. Brown
Environmental Manager
Atlantic Richfield
Company
4 Centerpointe Drive, LPR 4-435
La Palma, CA 90623-1066

Subject: EPA Approval of Atlantic Richfield Company (ARC) Final Revised RI/FS Quality Assurance Plan (QAPP); revision 2 for the Leviathan Mine Site in Alpine County, California; dated January 27, 2017

Dear Mr. Brown:

The U.S. Environmental Protection Agency (EPA) has completed its review of the 2017 Atlantic Richfield (ARC) Final Revised RI/FS Quality Assurance Project Plan, Revision 2 (Revised QAPP) for the Leviathan Mine Site in Alpine County, California, dated January 27, 2017. This work was submitted to EPA pursuant to Administrative Order for Remedial Investigation and Feasibility Study, Leviathan Mine, Alpine County, California (CERCLA Docket No. 2008-18, June 23, 2008).

Background: ARC's Remedial Investigation/Feasibility Study (RI/FS) QAPP, was originally submitted to EPA on July 10, 2009, as Appendix B to the RI/FS Sampling and Analysis Plan (SAP) included in the RI/FS Program Work Plan (PWP). EPA subsequently approved the PWP with comments and direction in a letter dated May 13, 2010.

After ongoing discussions to ensure Remedial Investigation/ Feasibility (RIFS) data are fully presented, supported, validated and of sound quality and usability. ARC provided the 2013 Data Summary in October 2014.

In an email dated February 26, 2015, EPA requested specific presentation of data to be provided at a technical meeting to be held on April 1, 2015. No data was provided in advance of the meeting. The PowerPoint presentation from ARC simply provided overall quality assurance and quality control (QA/QC) program. EPA requested that ARC update, revise and submit the RI/FS QAPP. To ensure clarity on expectations, EPA formalized that request in written comments dated April 2, 2015 on the 2013 RI Data Summary Report (DSR).

EPA held a face to face meeting with ARC on December 10, 2015 requesting that the agenda focus on a discussion of data quality, data validation and data usability. The QAPP and the information requested in the April 2, 2015 letter were not made available in time for the meeting. The topic was generally discussed and the meeting was rescheduled to January 19, 2016.

On February 5, 2016, ARC provided an annotated Table of contents and a QAPP Crosswalk to help facilitate further discussions and had a conference call with ARC managers on February 10, 2016. EPA is preparing comments to this Table of Contents and will provide comments in a separate comment letter.

On March 9, 2016, ARC provided an RI/FS QAPP that was updated to address comments from the U.S. EPA letter dated February 9, 2016. Revisions to the revised RI/FS QAPP were discussed during a technical meeting on March 28, 2016.

EPA provided additional comments on the revised RI/FS QAPP on April 28, 2016 and conditionally approved the QAPP with instructions for ARC to submit a revised Final Updated QAPP and Data Management Plan within 30 days.

On June 17, 2016 ARC provided the revised Final RI/FS QAPP (Revision No. 1) and response to comments (RTC) table.

On November 21, 2016. EPA d conditionally approved the QAPP stating: *Within 60 days, or b y January 17 , 2017 . EPA directs ARC to provide a line by line response to these comments and submit a revised Final Updated Quality Assurance Project Plan (QAPP) and Data Management Plan that incorporates the Database, the DQOs and the Conceptual Site Model incorporating these changes .*

On January 21, 2017 ARC provided a final revised QAPP with an up to date data management plan, database, DQOs and CSM.

EPA has completed is review and finds that ARC's response is adequate; and approves the final revised January 27, 2017 QAPP.

EPA directs ARC to implement the quality control procedures identified in the QAPP for all data. Further, ARC shall ensure, at a minimum, that each annual QAPP update includes any necessary revisions to the Data Quality Objectives and the CSM with a clear written statement that these have been reviewed and updated or remains unchanged. That shall be explicitly identified in the annual QAPP update.

If you have any questions, please feel free to contact me at (415) 947-4183 or Deschambault.lynda@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Lynda Deschambault". The ink is dark and the signature is fluid.

Lynda Deschambault
Remedial Project Manager

Cc by electronic mail:

Neil Mortimer, Washoe Tribe of Nevada and California

Michelle Hochrein, Washoe Tribe of Nevada and California

Douglas Carey, California Regional Water Quality Control Board, Lahontan Region

David Friedman, Nevada Department of Environmental Protection

Kenneth Maas, United States Forest Service

Tom Maurer, United States Fish and Wildlife Service

Toby McBride, United States Fish and Wildlife Service Steve

Hampton, California Department of Fish and Wildlife

Marc Lombardi, AMEC